

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**SURREBUTTAL TESTIMONY OF
JAMES J. BOLDT
ON BEHALF OF THE
UNITED STATES POSTAL SERVICE**

(USPS-SRT-2)

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Autobiographical Sketch

My name is James J. Boldt. I serve as the National Manager, Customer Service Operations, in the Office of Delivery and Post Office Operations at Postal Service headquarters. For purposes of this surrebuttal testimony, I incorporate by reference the geographical sketch that appears in my direct testimony in this docket, USPS-T-1.

1 **I. Purpose and Scope of Testimony**

2 The purpose of this testimony is to rebut that portion of the testimony of National
3 League of Postmasters of the United States witness Mark Strong (NLPM-RT-1) which
4 alleges that, in its administration of the USPS Handbook PO-101 discontinuance review
5 process, the Postal Service "has been taking steps that both hinder meaningful
6 community input, while simultaneously cutting off [P]ost [O]ffices as though the decision
7 to close them has already been made." See NLPM-RT-1 at 29. At pages 29-34 of his
8 testimony, and at pages 1440-41 of Transcript Volume 4, Mr. Strong identifies specific
9 instances in which he believes this has occurred.

10 Based on examination of his claims, and direct consultation with those involved
11 on behalf of the Postal Service, my testimony provides information supporting an
12 objective perspective. Out of respect for the integrity of the 39 U.S.C. 404(d) review
13 process that applies, or may apply, to Postal Service final determinations regarding
14 those offices discussed in Mr. Strong's testimony, my intention is to avoid influencing
15 any review on appeal which is currently docketed with the Commission or may become
16 docketed in the future. Hence my purpose is simply to share information I gathered
17 directly from field personnel responsible for the conduct of discontinuance studies and
18 whose conduct witness Strong criticizes, on the pages cited above.

19 My testimony also responds to Mr. Strong's statements at pages 1555-57 of Tr.
20 Vol. 4 regarding changes in access to the Change Suspension Discontinuance Center
21 (CSDC) database.

1 **II. A Different Understanding Emerges When One Speaks Directly To Persons**
2 **Involved**

3
4 As the National Manager of Customer Service Operations in the Office of
5 Delivery and Post Office Operations at Postal Service Headquarters, I am tasked with
6 developing and overseeing policies and procedures related to the discontinuance of
7 Postal Service retail facilities, and managing the implementation of those policies and
8 procedures in the field. As part of that responsibility, I asked my staff to: (i) identify the
9 field postal managers directly involved in the discontinuance activity referenced by
10 witness Strong, (ii) transmit copies of that portion of his testimony to them, and (iii) invite
11 each manager to discuss the testimony with me directly, as it pertained to
12 discontinuance activity in which they were engaged. I spoke directly with each of the
13 field discontinuance coordinators. In each case, they provided me or directed my
14 attention to information that demonstrates Mr. Strong's testimony either omits material
15 facts or depends on questionable accounts of events. On behalf of those managers and
16 career postal employees, I am relaying to the Commission their accounts of the
17 discontinuance activity described in Mr. Strong's testimony. It seems only fair that the
18 Commission have the benefit of this information in evaluating Mr. Strong's claims that
19 the Postal Service "has been taking steps that both hinder meaningful community input,
20 while simultaneously cutting off [P]ost [O]ffices as though the decision to close them has
21 already been made" in the instances he references.

1 **A. Mr. Strong's Testimony Does Not Include Material Facts That Impact**
2 **the Scheduling of Community Meetings.**

3 **1. The Gateway District**
4

5 At page 29 of NLPM-RT-1, witness Strong offers an email from a staff member of
6 United States Congressman Jerry Costello, 12th Illinois District, as evidence that the
7 Postal Service "has been taking steps that both hinder meaningful community input,
8 while simultaneously cutting off [P]ost [O]ffices as though the decision to close them has
9 already been made."¹ The Commission will observe that the email was provided by the
10 Postal Service in USPS Library Reference N2011-1/22² and that it was part of a series
11 of emails exchanged between the Congressman's office and the Gateway District
12 discontinuance review team.³ I see nothing in that email exchange suggesting the
13 District took any steps intended to hinder meaningful community input. To the contrary,
14 the email chain demonstrates that, before publishing a final schedule of community
15 meetings, the Gateway District developed a tentative schedule, which it shared in a
16 nonpublic briefing with the Congressman's office, and later modified in response to
17 concerns expressed about some of the tentative meeting times, before publishing it.

18 If read in isolation and out of context, the email quoted at page 29 of NLPM-RT-1
19 might lead one to conclude that the Postal Service was the source of public confusion
20 about Gateway District meeting dates and times. However, the complete email chain
21 reveals that public confusion can result when the recipient of tentative information

¹ This claim by witness Strong involves one of the most common complaints raised by postal customers faced with the possible discontinuance of a postal retail facility: the Postal Service explanation of its tentative plan for replacement services in advance of a community meeting is greeted by customers with the charge that the Postal Service has already decided what it will do.

² USPS LR N2011-1/122, 1st PDF document, page 8.

³ *Id.* at pages 7-12.

1 (obtained in advance on a nonpublic basis and therefore subject to change as new
2 information comes to light) publicly disseminates it before confirming whether it is
3 prudent to do so.

4 Witness Strong's testimony implicitly asserts that the Gateway District failed to
5 follow USPS Handbook PO-101 section 251, which requires that management:

6 schedule each community meeting at a time that encourages customer
7 participation (such as during an evening or weekend), and

8
9 notify customers of the meeting date, time, and location at least five to seven
10 days in advance.

11
12 I should note that section 251 also requires that we reschedule meetings at more
13 convenient times if we receive information persuading us that the originally scheduled
14 times are inconvenient for most customers.

15 It should be emphasized that the purpose of USPS Handbook PO-101 section
16 251 is to give local discontinuance coordinators flexibility in determining meeting times
17 that encourage customer participation. No single time is ever consistent with all
18 customer preferences; hours within an office's normal hours of operation generally suit
19 customers who routinely visit that office, while inconveniencing customers who only
20 occasionally visit the office, conflicting with their work hours in many cases. Evening
21 hours may suit the occasional customers, while inconveniencing regular customers.
22 That is one reason why a discontinuance study process affords customers multiple
23 avenues for providing their input: questionnaires, community meeting, written
24 correspondence at any time, and if those opportunities do not suffice, then formal
25 comments on a proposal posted for 60 days.

1 Section 251.1 of the Handbook emphasizes that times *such as* evenings and
2 weekends encourage participation, but it does not preclude the selection of other times
3 that also encourage customer participation. I am informed by Sue Wandersee,
4 Gateway District Discontinuance Coordinator, that for some retail locations, the tentative
5 meeting time was established during regular business hours, based on the judgment
6 that it also would be convenient for and encourage participation by regular retail
7 customers at those locations, who of course could only visit the offices for that purpose
8 during business hours. I am informed that the final schedule of meetings that appears
9 at page 7 of the above-referenced PDF document reflects adjustments to establish
10 evening meetings for some locations responsive to consultation with Ms. Patti Sadnick,
11 of the Illinois chapter of the National League of Postmasters.

12 **2. Westphalia and Edwardsport, Indiana**

13 At pages 30-31 of NLPM-RT-1, witness Strong suggests irregularities in the
14 scheduling of the community meetings for the Westphalia and Edwardsport, Indiana
15 Post Office community meetings, by highlighting the fact that both meetings were
16 scheduled during the morning and that both were held in the town of Edwardsport,
17 depriving the residents of Westphalia the opportunity for a meeting in their own town. I
18 am informed by Cynthia Klaiber, Manager of Post Office Operations, Terre Haute IN,
19 that a judgment was made that meetings during times when the respective Post Offices
20 were utilized would encourage participation. Edwardsport Town Hall was offered as a
21 meeting location for that community. As an unincorporated area, Westphalia does not
22 have a similar public facility. After negotiations with the Salem United Church of Christ
23 in Westphalia failed to result in a mutually acceptable date and time, the Postal Service

1 was able to negotiate for an expanded use of the Edwardsport Town Hall, 4.5 miles
2 away, to accommodate both meetings. I am informed by Bicknell IN Postmaster Jason
3 VanPatten (who negotiated with the church and assisted in the conduct of the
4 Westphalia meeting) that the issue of the Westphalia meeting location was raised by the
5 church's representative at the Westphalia meeting in Edwardsport, where she
6 suggested alternate dates and times for holding the community meeting at the church in
7 Westphalia that were not offered during the scheduling negotiations. In hindsight, it now
8 seems possible that further negotiations with the church might have yielded an
9 opportunity to have conducted the Westphalia meeting in Westphalia. I believe that a
10 good faith effort was made by the Postal Service to achieve a meeting in Westphalia;
11 but the fact remains that the meeting was held and attended by customers, in a nearby
12 location.

13 **B. First-Hand Accounts of the Arkansas Community Meetings Vary**
14 **From Those Offered By Witness Strong**

15 **1. Alleene, Arkansas**
16

17 After consulting with the Jackie Stubitsch, Postmaster of Greenbrier AR and an
18 experienced Discontinuance Coordinator, I believe that the conduct of the community
19 meeting related to the proposed discontinuance of the Alleene, Arkansas Post Office (a
20 non-RAOI facility) did not deviate from applicable procedural requirements. At pages
21 31-32 of NLPM-RT-1, witness Strong provides an account of the Alleene, Arkansas
22 Post Office discontinuance community meeting. In this account is an assertion that the
23 community's questions and comments expressed orally at the meeting were not
24 recorded at the meeting and, therefore, were not made part of the administrative record
25 to be considered before a final determination was made. The meeting in question took

1 place on August 30, 2011. While postal officials can and do take notes in community
2 meetings, contrary to the claim by witness Strong, Handbook PO-101 does not⁴ require
3 that the notes be recorded during the meeting. Ms. Stubitsch informs me that she
4 recorded a written summary of the meeting shortly after its conclusion and incorporated
5 that summary in the official record forwarded up the chain-of-command for review. I
6 have confirmed the existence of that summary. Ms. Stubitsch denies saying at the
7 meeting that the customer concerns expressed at the meeting would *not* be made part
8 of the record for review. I have confirmed that such a summary exists in the CSDC file
9 for Alleene. Ms. Stubitsch has informed me that she encouraged meeting attendees to
10 complete questionnaires that had already been made available to them and volunteered
11 to collect any completed questionnaires at the conclusion of the meeting if any
12 attendees wanted to turn them in to her.

13 At page 31 of NLP-T-1, Mr. Strong testifies that USPS Handbook PO-101
14 requires that:
15

16 information regarding VPO and Contract Units be provided before the
17 community meeting to be able to evaluate whether it is cost effective to open
18 either one. But, the Coordinator did not check to see if there was anyone
19 interested in opening a VPO or Contract Unit, but told the attendees that it was
20 their responsibility to find someone that is interested if that is what the community
21 wants.
22

23
24 It is true that the Handbook PO-101 section 321 specifies that the Postal Service must
25 "describe and analyze" in the formal proposal "details of replacement service." At the
26 community meeting prior to that proposal, however, discussion would usually touch
27 upon alternate access options, including those located nearby. In response to Mr.
28 Strong's testimony, Ms. Stubitsch has asked me to inform the Commission that she

⁴ Nor did the predecessor version of the USPS Handbook PO-101.

1 indicated in the meeting that the Postal Service was contemplating cluster box delivery.
2 Contrary to Mr. Strong's characterization, she recalls seizing the opportunity at the
3 community meeting to solicit leads regarding other business establishments interested
4 in serving as alternate access providers. She also has informed me that during her visit
5 to Alleene, she met with the operator of a retail business near the Post Office to discuss
6 the possibility of operating a Village Post Office and left her business card to encourage
7 further dialogue on the topic.

8 Ms. Stubitsch recalls responding to all of questions and customer concerns
9 expressed at the meeting, but believes that Mr. Strong's testimony relies on account of
10 the question-and-answer portion of the meeting that is not faithful to what transpired.
11 For example, when asked by one individual what could be done to save the Post
12 Office, she recalls candidly replying that her role was not to save the Post Office from
13 being discontinued; she was there to answer questions about the discontinuance
14 process and why their office was under review, and to receive comments. In response
15 to a comment that she was to blame for the office being targeted for discontinuance
16 review, Ms. Stubitsch recalls responding that she was a postal employee whose job it
17 was to uphold the policies and procedures of the Postal Service. In response to the
18 suggestion that she was enjoying the benefit of overtime pay for her participation in the
19 meeting, Ms. Stubitsch recalls explaining that she had begun her workday at 7:30am,
20 and that her postal position was exempt from the overtime requirements of the Fair
21 Labor Standards Act.

22 When one customer questioned whether requiring the residents of Alleene to
23 obtain service at the Winthrop Post Office 9 miles away would be consistent with the

1 obligation of the Postal Service to provide a maximum degree of effective service to
2 rural residents, Ms. Stubitsch recalls affirming, to the audible displeasure of some of
3 those assembled, that the Postal Service might reach that conclusion. When asked
4 whether she personally drove or would like to drive 9 miles to buy stamps, she revealed
5 that it was her personal practice to purchase stamps online. She also recalls reminding
6 customers of the option to purchase stamps by mail.

7 Ms. Stubitsch recalls being challenged about the law that prohibits the closing a
8 small Post Office solely because it is operating at a deficit. It is her recollection that she
9 defending the proposed discontinuance as not being contrary to any law that she was
10 aware of, and as being consistent with the USPS Handbook PO-101. She recalls
11 attempting to explain how declining workload could trigger discontinuance review, but
12 sensing that audience was not receptive to her explanation, did not persist. She has no
13 recollection of referring to any "reorganization" of the Postal Service. At one point in
14 the meeting, Ms. Stubitsch recalls that a participant expressed his displeasure by loudly
15 calling her a "Yankee." She informs me that she was approached after the meeting by
16 another customer who referred to her by an epithet spelled similarly to the second
17 syllable of her last name.

18 **2. Fisher, Arkansas**

19 Mr. Strong's account of the Fisher Arkansas, Post Office discontinuance meeting
20 at pages 32-33 of NLPM-RT-1 seems to be even less reliable. There, he alleges that
21 attendees at the Fisher Post Office meeting were told that that day was the last day for
22 comments or questions, even though the 60-day comment period had not expired. Ms.
23 Stubitsch, who conducted the meeting, recalls advising the attendees their

1 questionnaires should have been returned to the address listed on the form, in the
2 postage-paid envelopes that were provided. She recalls that, consistent with her
3 practice in Alleene, she volunteered to collect any written questionnaires and comments
4 that anyone wanted to submit and reminded customers that they were still able to send
5 in comments on the optional comment forms available at the Post Office. Additionally,
6 she recalls informing customers that letters could be written during the timeframe that
7 the proposal notice was to be posted in the Fisher Post Office lobby. Ms. Stubitsch has
8 asked me to make clear that, contrary to Mr. Strong's claim, notes were recorded during
9 the September 13, 2011 meeting for the Postal Service by Terrie Shepherd, Manager,
10 Post Office Operations, and placed in the administrative record.

11 At page 33 of NLPM-RT-1, Mr. Strong testifies that, when asked if writing their
12 Congressman would help save their office, customers at the Fisher Post Office
13 community meeting were told words to the effect that it probably would not do any good,
14 that their Congressman had already sent a letter supporting the communities and that
15 no further contact was warranted. In contrast, Ms. Stubitsch informs me that when
16 asked by a Fischer customer whether they should be writing their elected
17 representatives, she assured them that members of both houses of Congress had
18 already sent letters supporting the communities. She has informed me that she gave the
19 floor at the meeting to a staff member representing the office of United States Senator
20 John Boozman of Arkansas, and that the staff member informed the audience that the
21 Senator supported their efforts and that there was no need for additional letters
22 encouraging him to do so. As for the modular facility that houses the Fischer Post
23 Office, Ms. Stubitsch recalls things differently from Mr. Strong's source. According to

1 her, a resident asked whether, if the Fisher Post Office closed, the community could
2 continue to use the modular building as a mail receptacle. Ms. Stubitsch tells me that
3 she responded that, should the final decision be made to close the Fisher Post Office,
4 they would most likely be able to purchase the building and use it as the town's mail
5 receptacle, if modifications were made to it. She has told me that she spoke to Mayor
6 Homer Anshultz of Fisher after the meeting, gave him her business card, and
7 encouraged him to call if he wanted to be directed to the appropriate postal officials to
8 discuss purchasing the building.

9 **C. The Facts Surrounding the Gepp and Wright Suspensions Tell A**
10 **Different Story**

11 **1. Gepp, Arkansas**

12 At pages 33-34 of NLPM-RT-1, witness Strong offers characterizations of the
13 circumstances surrounding the suspension of two Post Offices to suggest irregularities
14 on the part of the Postal Service. As explained below, he has not been furnished with a
15 complete portrait of the situation.

16 According to section 611 of USPS Handbook PO-101, the lack of qualified
17 personnel to operate a Postal Service retail facility is a circumstance which may justify
18 an emergency suspension. Wherever possible, postal policy is to initiate the
19 discontinuance process sufficiently in advance of the circumstance prompting the
20 emergency suspension to allow a meaningful opportunity for public input to be
21 considered before services are suspended. However, this was not possible prior to the
22 suspensions of the Gepp and Wright Post Offices.

23 At page 33 of NLPM-RT-1, witness Strong claims that

1 The only reasoning provided for closing the Gepp Post Office was that no one
2 could be found to cover a 5-day break for the current Officer in Charge, despite
3 the fact that at least one Postmaster and his PSE [Postal Support Employee]
4 volunteered. The need for the short-term break in service was known well in
5 advance. The postmaster of the gaining post office received the first notice the
6 same day that everything was moved from the Gepp office to his post office.
7 Gepp was on the list to be closed, then emergency suspended because of —no
8 available help and then moved to another town the next weekend.

9
10 A final determination to discontinue the Gepp, Arkansas Post Office was posted
11 on August 4, 2011, with the expectation that the office would be closed on October 4,
12 2011. A petition for review was filed with the Commission on September 1, 2011. As a
13 result, the August 4 notice was removed pending the outcome of the Docket No. A2011-
14 60 appeal. It is not my intent here to address the merits of that appeal.

15 Effective September 8, 2011, at the request of Shane Davis, Manager of Post
16 Office Operations, the office was temporarily suspended for the duration of the non-
17 career postmaster relief (PMR) employee's required five-day break in service because
18 substitute personnel could not be found to operate the office during the anticipated gap.
19 At the time, it was anticipated the PMR would return to service in a matter of days and
20 would operate the office until the scheduled discontinuance took effect. Unfortunately,
21 for the Gepp community, that suspension was followed by an indefinite emergency
22 suspension effective immediately thereafter when the PMR indicated that she would not
23 be returning for employment at that location at the conclusion of the five-day break and
24 substitute personnel could not be located.

25 Mr. Strong alleges at page 33 of NLPM-RT-1 that "at least one Postmaster and
26 his PSE (Postal Support Employee) volunteered." However, I am assured by Ms. Elora
27 Gosche, Saint Joe, Arkansas Postmaster and Area 4 Human Resource Administrator
28 that she made efforts to identify employees throughout northeast Arkansas from

1 Batesville to Marshall willing to cover the Gepp Post Office during both the anticipated
2 five-day break in service and thereafter, but that those efforts did not bear fruit because
3 no one (including the PSE and Postmaster referenced by Mr. Strong) was available to
4 work five continuous days including a Saturday, as would have been necessary.⁵ At
5 page 34 of NLPM-RT-1, Mr. Strong points to section 212.21 of USPS Handbook PO-
6 101 and seems to suggest that the Postal Service failed to initiate the discontinuance
7 process sufficiently in advance of the circumstances prompting the emergency
8 suspension to allow a meaningful opportunity for public input to be taken into account
9 before services are suspended. The Handbook PO-101 section in question states that
10 this should be done *wherever possible*, recognizing that there will be extraordinary
11 circumstances where that may not be the case. Without treading upon the Docket
12 A2011-60 appeal process, it seems fair to comment that the Commission might well
13 conclude that extraordinary circumstances existed here.

14 **2. Wright, Arkansas**

15 Regarding the Wright, Arkansas Post Office, witness Strong alleges that:

16 [t]he need for a replacement OIC at the Wright Post Office was also known far in
17 advance, since the day the current Postmaster began the retirement process.

18
19 NLPM-RT-1 at 33. Ms. Lisse Fish, Manager, Post Office Operations, informs me that,
20 during the last two weeks in August and the first week of September 2011, in
21 anticipation of the retirement of the Postmaster at this location, she actively solicited
22 employees in locations such as Pine Bluff (25 miles south) and Little Rock (40 miles
23 north) to find one to serve as officer-in-charge. On October 8, 2011, when these efforts

⁵ Ms. Gosche informs me that the Postmaster only volunteered the PSE employee, not himself; further, that she contacted the PSE employee directly only to discover that the employee was available for only one of the five days of the anticipated gap in service; and that the Postmaster's offer to volunteer the PSE employee was not made until the day that suspension was initiated.

1 bore no fruit, a notice was posted informing the public of the decision to place the retail
2 operation in emergency suspension status and the Post Office Box operation was
3 moved to the Tucker Post Office 8 miles away. Customers already receive rural
4 delivery in the area from Tucker, Arkansas which is located less than 8 miles from the
5 Wright Post Office. I am informed by Ms. Fish that the community meeting took place
6 on October 12, 2011. It is unfortunate for postal customers that personnel issues within
7 the Postal Service can lead to the unavailability of staff to operate a retail facility at a
8 particular location.

9 **D. Witness Strong Misses the Mark In His Home State**

10
11 At pages 1440-41 of Tr. Vol. 4, witness Strong references a letter from United
12 States Senator Max Baucus of Montana in which the Senator expresses concern that
13 the Postal Service has apparently announced decisions to discontinue operations at the
14 Dupuyer and Galata post offices, within a week of the community meetings at which it
15 solicited public input regarding their proposed discontinuance. Witness Strong implies
16 that the Senator's letter is evidence that the community meeting in each case was the
17 equivalent of a mere item on a checklist for postal management in its rush to make final
18 determinations days after each community meeting. The Postal Service assumes that
19 the Senator's expression of concern is a reasonable response to a description of the
20 notices provided by someone who apparently misinterpreted them. For the
21 convenience of the Commission, I have attached copies of each notice. As the
22 Commission will observe, each notice emphasizes that a proposal to discontinue each
23 office is being considered and that no decision had been made.

1 **E. CSDC Access**

2 During oral cross-examination at page 1555-57 of Tr. Vol. 4, witness Strong
3 alluded to a change implemented at the direction of Dean Granholm, Vice President,
4 Delivery and Post Office Operations, regarding access to the Change Suspension
5 Discontinuance Center (CSDC) database. As the Commission is aware, CSDC is a
6 dynamic database in which the Postal Service, among other things, manages the
7 conduct of facility-specific retail discontinuance studies as they progress from initiation
8 through the proposal stage to a final determination. CSDC discontinuance files are
9 dynamic and, at any given time, can contain numerous pre-decisional works-in-
10 progress. The system is accessible to District, Area and Headquarters personnel
11 whose day-to-day postal responsibilities are of such a nature as to justify access to
12 CSDC data on a need-to-know basis. It is important to the integrity of the content of
13 facility-specific CSDC files that only those employees with a need to access them in the
14 performance of their official duties be allowed to do so. It also is important to the
15 integrity and reliability of communications regarding pending or contemplated
16 discontinuance activity that internal and external stakeholders be notified in a manner
17 that is consistent with employee union and management association stakeholder notice
18 obligations to which the Postal Service has agreed, as well as Congressional
19 stakeholder notification commitments that the Postal Service strives to honor.

20 While it may have been true in the past that tens of thousands of active
21 employees had access to CSDC-I, including national officers of postal management
22 associations, the application of a need-to-know constraint is true of all postal
23 applications, especially in today's SOX environment. As with a wide variety of other
24 postal data systems, CSDC-II now operates to deprive employees in Mr. Strong's shoes

1 -- those on the rolls, but not performing postal duties that would justify a need-to-know
2 status -- from access to the current CSDC II system. The Postal Service will continue to
3 engage with NLP on personnel issues of concern to it and, in that context, respond to
4 CSDC-based information requests in an appropriate manner.

5 **III. Conclusion**

6
7 In sum, the above accounts provide a more balanced portrait of the allegations
8 presented in Mr. Strong's testimony. Postal management takes very seriously its
9 obligation to be fair and honest in its representations to customers, and the requirement
10 to be compliant with the Handbook PO-101. With many discontinuance studies now
11 pending, it is understandable that sometimes the process will be executed on the
12 ground less than perfectly, and oversights and misstatements may occur. At the same
13 time, it is apparent that the discontinuance process can generate perfectly
14 understandable emotional responses among potentially affected postal customers and
15 employees such that statements communicated with crystal clarity can be
16 misinterpreted. When situations involving deviations from existing policy come to senior
17 management's attention, training and remedial measures are then employed so as to
18 prevent recurrences from arising. Finally, outside observers must be cautious in
19 drawing firm conclusions about patterns or practices, based only third-party accounts of
20 a few isolated incidents.

Date of Posting: 09/30/2011

Date of Removal: 12/01/2011

PROPOSAL TO CLOSE
THE DUPUYER, MT POST OFFICE
AND EXTEND
SERVICE BY HIGHWAY CONTRACT ROUTE SERVICE

DOCKET NUMBER 1361503 - 59432

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is proposing to close the Dupuyer, MT Post Office and provide delivery and retail services by highway contract route service under the administrative responsibility of the Valier Post Office, located 23.0 miles away.

The office is being studied for possible closing or consolidation due to the following reasons; Due to declining office workload, which may indicate that maintaining this facility is not warranted. Over the past several years, this office has experienced a steady decline in revenue and/or volume.

The Dupuyer Post Office provides retail service from 800 to 1230 - 1300 to 1515 Monday through Friday and 900 to 1045 on Saturday. Over the past several years there has been a decline in the amount of walk in revenue generated. The revenue trend is as follows: FY 07 \$ 17,491, FY 08 \$ 18,128, FY 09 \$ 17,589 and FY 10 \$ 14,335.

On September 30, 2011, representatives from the Postal Service will be available at Dupuyer Community Hall from 530pm to 630pm to answer questions and provide information to customers.

On or about September 23, 2011, questionnaires were distributed to customers of the Dupuyer Post Office. Questionnaires were also available over the counter for retail customers at the Dupuyer Post Office.

If this proposal is implemented, delivery and retail services will be provided by the Valier Post Office, an EAS-13 level office. Window service hours at the Valier Post Office are from 900 to 1200 - 1300 to 1615, Monday through Friday, and closed on Saturday.

Some advantages of the proposal are:

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Some disadvantages of the proposal are:

1. The loss of a retail outlet and a postmaster position in the community. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

II. EFFECT ON COMMUNITY

Dupuyer is an unincorporated community located in Pondera County. The community is administered politically by Pondera County. Police protection is provided by the Pondera County. Fire protection is provided by the local volunteer fire department. The community is comprised of Retirees and area farmers and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: Pierre's Bar and Grill, Dupuyer Cache, Inn Dupuyer (Bed & Breakfast), Beaverslide Dry Goods, Rocky Mountain Motor Service, Anderson Ranch, Arrow S Ranch, TRM Ranch, Heirmosa Ranch, Rappold Ranch, Breeding Ranch, Artful Dodge Bus contractor, Dupuyer school, Catholic Church, Dupuyer Community Club, Dupuyer Garden Club, Theodore Roosevelt Memorial Ranch, Boone & Crockett Club, County & State Highway Department . Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Dupuyer Post Office will be available at the Valier Post Office. Government forms normally provided by the Post Office will also be available at the Valier Post Office or by contacting your local government agency.

This proposed office provides assistance to the senior and handicapped citizens .

This Dupuyer Post Office is not listed as a historic landmark. The community name will be maintained for customer addressing, and the Zip Code is not expected to change.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this proposal will not adversely affect the community and every effort will be made to maintain the identity.

III. EFFECT ON EMPLOYEES

There is currently a Postmaster assigned to this unit. The Postmaster may be moved to another facility if possible. Finally there are 1 PMR(s) assigned to this unit. The PMR(s) may be separated from the Postal Service.

IV. ECONOMIC SAVINGS

The Postal Service estimates a ten year savings of \$ 299,805 with a breakdown as follows:

Building Maintenance	\$ 0
Utilities	\$ 0
Transportation	\$ -89,324
EAS Craft & Labor	\$ 534,344
Contracts	\$ -61,617
Rent	\$ 0
Relocation One-Time Cost	\$ -1,830
Total Ten Year Savings	\$ 299,805

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

The Postal Service is proposing to close the Dupuyer, MT Post Office and provide delivery and retail services by highway contract route service under the administrative responsibility of the Valier Post Office, located 23.0 miles away.

The Postmaster assigned to this unit may be moved to another facility if possible. The 1 PMR(s) assigned to this unit may be separated from the Postal Service. The mail volume has declined. Effective and regular service will continue to be provided by highway contract route service.

The Dupuyer Post Office provided delivery and retail service to 79 PO Box or general delivery customers and no delivery route customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$ 299,805 over the next ten years. A disadvantage to some may be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

VII. NOTICES

- A. Support Materials. Copies of all materials upon which this proposal is based are available for public inspection at the Dupuyer Post Office and Valier Post Office during normal office hours.
- B. This is a proposal. It is not a final determination to close this post office. If a final determination is made to close this post office, after public comments on this proposal are received and taken into account, a notice of that final determination will be posted in this office.

The final determination will contain instructions on how affected customers may appeal that decision to the Postal Regulatory Commission. Any such appeal must be received by the commission within 30 days of the posting of the final determination.



09/30/2011

KENNETH BATES JR
Manager, Post Office Operations

Date

Date of Posting: 09/30/2011

Date of Removal: 12/01/2011

PROPOSAL TO CLOSE
THE GALATA, MT POST OFFICE
AND EXTEND
SERVICE BY HIGHWAY CONTRACT ROUTE SERVICE

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is proposing to close the Galata, MT Post Office and provide delivery and retail services by highway contract route service under the administrative responsibility of the Shelby Post Office, located 25.0 miles away.

The office is being studied for possible closing or consolidation due to the following reasons; Due to declining office workload, which may indicate that maintaining this facility is not warranted. Over the past several years, this office has experienced a steady decline in revenue and/or volume.

The Galata Post Office provides retail service from 730 to 1130 - 1200 to 1445 Monday through Friday and 1000 to 1145 on Saturday. Over the past several years there has been a decline in the amount of walk in revenue generated. The revenue trend is as follows: FY 07 \$ 17,449, FY 08 \$ 21,464, FY 09 \$ 20,635 and FY 10 \$ 15,406.

On September 28, 2011, representatives from the Postal Service were available at Galata Community Hall from 200pm to 300pm to answer questions and provide information to customers.

On or about September 22, 2011, questionnaires were distributed to customers of the Galata Post Office. Questionnaires were also available over the counter for retail customers at the Galata Post Office.

If this proposal is implemented, delivery and retail services will be provided by the Shelby Post Office, an EAS-18 level office. Window service hours at the Shelby Post Office are from 830 to 1700, Monday through Friday, and 900 to 1100 on Saturday.

Retail service is also available at the Chester Post Office an EAS-15 level office, located 20.0 miles away. Window service hours at Chester Post Office are from 900 to 1230 - 1330 to 1615, Monday through Friday and closed on Saturday. There are post office boxes available for rent.

Some advantages of the proposal are:

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Some disadvantages of the proposal are:

1. The loss of a retail outlet and a postmaster position in the community. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

II. EFFECT ON COMMUNITY

Galata is an unincorporated community located in Toole County. The community is administered politically by No local government. Police protection is provided by the Toole County Sheriff's Office. Fire protection is provided by the Toole County Fire Department. The community is comprised of Farmers, ranchers, general workers, large Hutterite Colony and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: Frasers Oil, the Galata Motel, Mary Kay, D & D Enterprises, Prairie Wood and Metal, Ramona's Arabian Stables, Lore Sisk's Jewelry, Avon, Larsen Production, Bootlegger Realty, Bootlegger Storage, Double D Farms Inc., B & K Farms, Leck Joint Ventures, Greenhill Grain, DAM Inc., KDG Inc., Sun Ag Inc., Rock Ridge Angus, Lerum Ag Inc., M & S Acres, Desert Acres, Blue Heron Ranch, Willow Ridge Ranch, Olive Branch Farms, Ratzburg Livestock, Diamond R Partnership, B & C Livestock, Bobcat Angus, D & L Livestock, Golden Fields Farm, 5R Lane and Cattle, Grand View Organics, Harvest Time Oil, Strawberry Creek Guns, Strawberry Creek Angus, Grassy Butte Farms, Griffin Grain & Livestock, Aklestad Bros., Hawks Angus, Scales Angus, Leck Land and Grain, Eagle Creek Guns, Burd Inc., Tastefully Simply, Bob Aklestad Farms, Brian Aklestad Farms, Flowers by Gayle, Scentsy Candles, Fenger Dirt and Gravel, Hi-Line Farms Inc., Elk Ridge Farms Inc., Boy Scouts, Girl Scouts, two 4-H groups, the American Legion, the American Legion Auxiliary, Sons of the American Legion, The Lodge, Gopher Brokers, The Good Neighbor Club, Galata WELCA, Hi-Line WABC. Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Galata Post Office will be available at the Shelby Post Office. Government forms normally provided by the Post Office will also be available at the Shelby Post Office or by contacting your local government agency.

This proposed office provides assistance to the senior and handicapped citizens.

This Galata Post Office is not listed as a historic landmark. The community name will be maintained for customer addressing, and the Zip Code is not expected to change.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this proposal will not adversely affect the community and every effort will be made to maintain the identity.

III. EFFECT ON EMPLOYEES

There is currently a Postmaster assigned to this unit. The Postmaster may be moved to another facility if possible. Finally there are 2 PMR(s) assigned to this unit. The PMR(s) may be separated from the Postal Service.

IV. ECONOMIC SAVINGS

The Postal Service estimates a ten year savings of \$ 299,446 with a breakdown as follows:

Building Maintenance	\$ 0
Utilities	\$ 13,008
Transportation	\$ -51,780
EAS Craft & Labor	\$ 531,526
Contracts	\$ -134,416
Rent	\$ 27,783
Relocation One-Time Cost	\$ -1,394
Total Ten Year Savings	\$ 299,446

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

The Postal Service is proposing to close the Galata, MT Post Office and provide delivery and retail services by highway contract route service under the administrative responsibility of the Shelby Post Office, located 25.0 miles away.

The Postmaster assigned to this unit may be moved to another facility if possible. The 2 PMR(s) assigned to this unit may be separated from the Postal Service. The mail volume has declined. Effective and regular service will continue to be provided by highway contract route service.

The Galata Post Office provided delivery and retail service to 39 PO Box or general delivery customers and 102 delivery route customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$ 299,446 over the next ten years. A disadvantage to some may be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

VII. NOTICES

- A. Support Materials. Copies of all materials upon which this proposal is based are available for public inspection at the Galata Post Office, Chester Post Office and Shelby Post Office during normal office hours.
- B. This is a proposal. It is not a final determination to close this post office. If a final determination is made to close this post office, after public comments on this proposal are received and taken into account, a notice of that final determination will be posted in this office.

The final determination will contain instructions on how affected customers may appeal that decision to the Postal Regulatory Commission. Any such appeal must be received by the commission within 30 days of the posting of the final determination.



09/30/2011

KENNETH BATES JR
Manager, Post Office Operations

Date